specific requirements of such carriers, to assure that their market entry needs are met.[14]

Attachment B provides a complete list and description of the performance measurements AT&T recommends.[15] That attachment also compares AT&T's recommendations to the measurements proposed in the Notice, as well as measurements proposed or supported by the DOJ, LCUG, and the RBOCs in various proceedings.[16] With only a handful of exceptions, each of AT&T's recommended measurements has been publicly supported by at least one (and usually many) RBOCs,[17] thus eliminating any serious claim of infeasibility or burden.

The principal gap in the Commission's proposed performance measurements is in the area of billing accuracy. AT&T, DOJ, LCUG and several RBOCs (SBC and BellSouth) all

---

[14] Attachment B references two measures for UNEs: availability and performance. These measurements should be amplified and clarified based upon the comments of facilities-based CLECs.

[15] AT&T recommends a slight modification to some of the proposed measurement formulas. Each of these proposals is highlighted n Attachment B.

[16] The Notice recommends two measurements (Orders Rejected and Average Submissions per Order) that AT&T had not previously identified. AT&T believes such measurements can provide useful information regarding ILEC performance.

[17] The exceptions are: Average Jeopardy Interval (which is supported by the Commission, DOJ and LCUG); Collocation Provisioning Intervals and Missed Due Dates (supported by the Commission); and Call Abandonment (Support Center) and Network Performance (both supported by LCUG).

support the adoption of billing accuracy measures, which are critical to CLECs for three reasons. First, CLECs need accurate information on their own customers' usage so they can render and collect end user bills in a commercially reasonable manner. Second, CLECs that purchase unbundled switching need accurate usage data so they can render correct access bills to interexchange carriers, especially for terminating access. Third, CLECs need accurate wholesale bills from ILECs so they can conduct their business in an orderly and economically efficient manner. The Notice (¶ 88) recognizes the need for timely provision of billing information. It is equally important that CLECs receive accurate billing information.

AT&T also strongly supports the Commission's proposal (¶ 72) to measure order flowthrough. Most ILEC orders flow automatically from their ordering systems into their provisioning systems directly to the work groups (or systems) responsible for implementing the service request. CLECs will be simply unable to compete if they must deal with processes that require substantial manual intervention between the ordering and provisioning processes.[18]

---

[18] Application of BellSouth Corporation, et al. Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, interLATA Services to South Carolina, CC Docket No. 97-208, Memorandum Opinion and Order, released December 24, 1997, ("South Carolina Order")

(footnote continued on next page)

Because of the importance of flowthrough to successful CLEC operations, the measurement of flowthrough should be carefully constructed. ILECs should not only be required to report on orders that fall out to manual processing in either the ILEC Service Order Processor ("SOP") or the Service Order Activation and Control ("SOAC") processing stage. They should also report on orders that may subsequently fall out to manual processing, as may occur with Directory Service Requests.

In addition, the Notice (¶¶ 77-79) seeks comment on whether to adopt specific reporting requirements for the ILECs' 911 database. AT&T supports such requirements, because they affect the health and safety of retail telephone subscribers. If an ILEC's operational processes cannot provide CLEC customers with updates of the 911 databases that are as timely and accurate as for ILEC end users, then CLEC customers are placed at risk, and CLECs' business reputation can also be harmed due solely to the ILEC's actions.

(footnote continued from previous page)

¶120; Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, interLATA Services in Michigan, CC Docket No. 97-137, Memorandum Opinion and Order, released August 19, 1997, ("Michigan Order"), ¶196

AT&T also suggests that the Commission adopt the same requirements for other ILEC databases, particularly the Line Information Data Base (LIDB), and the ILEC's directory listing database. CLECs need access, and prompt updates, to these databases in order to provide their end users with services that are equal in quality to the ILEC's retail services. Because the CLECs must rely on the ILEC to update these databases, the ILEC must provide them with parity in terms of accuracy and timeliness. For example, if LIDB information is not current or accurate, collect calls to the customer's line may be erroneously prohibited. If the Directory Listing database update is late, a customer's listing may be omitted for a full year, and if the listing is erroneous, it may not be corrected until the annual update of the directory.

B. ILECs' Performance Measurements Must Be Sufficiently Disaggregated To Permit An Accurate Comparison Of ILECs' Performance For Themselves And For Competitors.

Establishing a set of general performance measurements is only the first step in creating a process to determine whether ILECs have met their statutory nondiscrimination requirements. The ILECs' performance data must then be sufficiently disaggregated to assure that the comparisons being made reflect the actual marketplace experience of CLECs (both individually and collectively) and consumers in the marketplace.

As a threshold matter, the Notice (¶ 39) correctly concludes that ILECs must report results on a CLEC-specific basis. This is a fundamental level of data gathering and reporting that is essential to permit individual new entrants to insure they are being treated in the manner required by Section 251. No exception to this requirement should be permitted, unless an ILEC can convincingly demonstrate that it is technically infeasible to perform carrier-specific measurements.[19] Further, any exceptions should be time-bound and subject to review at reasonable intervals, to assure that the technical basis for the exception remains valid.

There are four primary dimensions that must be reviewed, in appropriate circumstances, to assure that ILEC performance measurements are meaningfully disaggregated: product groupings; work activities associated with a service request; work volume/complexity; and geography. The importance of these dimensions is vividly demonstrated by a recent affidavit from a Pacific Bell witness submitted in its California Section 271 proceeding:

> "Due dates reflect standard intervals based upon product type, complexity and regional resource

---

[19] For some measurements, e.g. pre-order cycle times, some RBOCs have even attempted to aggregate measurements for all carriers, both ILEC and CLEC, to generate a single performance result. This is clearly inadequate.

> requirements. Pacific also provisions its retail service orders, although product type may differ from what is offered to CLECs, by using the same criteria of product type, complexity and resource requirements."

There are commonalties across some performance measurements that make it unnecessary to apply each of these dimensions in every case.[20] Nevertheless, it is important to understand the market significance of each of the principal disaggregation dimensions.

1. Performance Measurements Must Be Made For Additional ILEC Product Categories.

It is important to assure that the performance measurements are applied to appropriate groupings of ILEC UNEs, facilities and services, and that only the measurements for competitively related services are put into each product category. One of the principal reasons for this requirement is that ILECs use different processes to support different services. For example, the ILEC infrastructure used to support POTS is typically different from that which supports special services. The need for sufficient product disaggregation is further shown by the fact that ILECs frequently require specific information from CLECs on the type of service being requested in order to poll data in the appropriate ILEC system or database. For

---

[20] See Part II.B.4 below.

example, as the Pacific Bell excerpt quoted above demonstrates, ILECs typically require a CLEC to provide information regarding the "product type" in order to obtain a due date for installation, because the due dates vary based on this factor, both for CLECs and ILEC retail customers.

For resale orders, ILECs also often require information on whether the customer is a business or residence, and may have different intervals depending on the class of customer.[21] Moreover, ILEC customer records typically use codes that identify accounts as either residential or business. Thus, it would be both reasonable and feasible to require reporting by customer type for resale POTS services. Most, but not all, RBOCs have agreed to do so.[22] This should be a requirement for all ILECs.

The Notice identifies specific ILEC products and services for which performance measurements must be made. AT&T supports the list offered in the Notice, but urges the Commission to require ILECs to provide the performance

---

[21] The business and residential communications markets often have very different profiles, both in terms of service preferences and rate structures. Further, business and residential customers are reached through different channels of communication and customer support mechanisms, and they are likely to have different experiences in ordering and receiving services from ILECs.

[22] See Attachment C.

measurements described in Part II.A for a number of additional ILEC products. Attachment C provides a complete list of products that should be disaggregated for measurement purposes,[23] and compares that list to commitments that have already been made by RBOCs in at least one state. In nearly every case, at least one RBOC has already agreed to provide the additional product disaggregation AT&T believes is important.

In particular, as an immediate step, the Commission should assure that the Business POTS category does not reflect an amalgamation of dissimilar business services. [24] The Commission also should assure that the UNE loop category is subdivided into the major types of loops (8db analog, 2-wire digital, 4-wire digital, ADSL, and HDSL.[25] Finally,

---

[23] AT&T's proposed product categories are set forth in the "Proposed" column of Attachment C.

[24] Some ILECs have defined Business POTS in an overly broad manner. The performance results reflected for Business POTS should be restricted to what the ILECs commonly refer to as single or multiline business exchange service for both measured and flat rated usage arrangements. While results for other exchange services (e.g., Centrex, PBX trunks, ISDN, etc.) should also be reported, they should each be reported as separate categories, rather than being aggregated with simple business exchange service results.

[25] Ultimately, optical fiber, and possibly coaxial connections from the cental office to the customer's premise may also need to be separately monitored.

the Commission should take steps to assure that UNE dedicated transport is reported based upon commonly used throughput capacities (e.g., DS0, DS1, DS3, and ≥DS3), because each typically takes a different amount of time to provision and maintain.

The balance of the product disaggregations identified in Attachment C, although important, could be adopted over a time-bound period (such as six months) as demand for these types of other resale and interconnection offerings grow. Indeed, the Commission should establish a mechanism so that the types of disaggregation specified can be adapted to meet the actual needs of the marketplace as it changes over time.

2. Performance Measurements Must Be Disaggregated To Account For The Different Types Of Activities That Are Necessary To Provide Specific Services And Elements.

The measurement process must also recognize that different types of activities, even within a product category, may require different amounts of time to complete. For example, orders for new installations, especially orders that require a technician to be dispatched outside the ILEC's central office, take longer than mere migrations "as is" of a customer who wants only to change service providers, not services or features. The Notice itself (Appx. A, p. A2) recognizes this fact. Thus, the amount and type of work activities that are performed in connection with various types of CLEC service requests should be

considered in determining how that transaction type should be measured and compared to work the ILEC performs for itself.

Attachment D provides a list of key activities that have a significant impact on the time necessary to complete ILEC and CLEC service requests, together with a list of activity disaggregation commitments that have been made by the RBOCs. Again, the activity disaggregations AT&T proposes have in many cases been agreed to by at least one RBOC. All of the pre-ordering activity disaggregations and most of the maintenance activity disaggregations AT&T suggests have also been agreed to by one or more RBOCs. In addition, nearly all RBOCs have committed to disaggregate provisioning data based on whether some type of dispatch or "field work" is required.[26] However, the type of disaggregation AT&T suggests will provide a much better assessment that compares the actual work ILECs perform for

---

[26] Care must be exercised in defining "dispatch' and "non-dispatch" work, because different ILECs define the terms differently. For example, Pacific Bell defines dispatch activities as "Outside Repair," which is repair beyond the central office and "Inside Repair," which is work done in the central office. In contrast, Bell Atlantic defines "No Dispatch" to include all orders that require no dispatch outside of a central office, including orders that require switch translations and/or central office wiring work. Thus, Bell Atlantic's definition aggregates inside central office work with orders for which only software work is needed.

themselves and their retail customers with like work they perform for CLECs.[27]

Billing measurements are needed to reflect the different source and use of the records and invoices generated. The billing for services resale, unbundled network elements, and interconnection should be separately monitored, because the content of the invoices will vary for each. In addition, the invoices are likely to be generated out of different ILEC systems; thus, it is reasonable to expect that the timeliness and accuracy of the invoices may vary. For similar reasons, the timeliness and accuracy of usage data delivered for services resale and unbundled network elements should be separately monitored. The content of the records for each type of usage is different and may even be delivered in separate files (one for end users and one for access and interconnection).

The Commission (¶58) correctly notes that "[t]imely notification of an order's status enables a competing carrier to inform its customer promptly of the progress of an order, or of any rescheduling or order change." It has also recognized that "[t]imely delivery of order rejection

---

[27] AT&T suggests that provisioning activities be broken down into outside dispatch; inside (central office) dispatch; software only provisioning; disconnects and administrative activity.

notices has a direct impact on a new entrant's ability to serve customers, because new entrants cannot correct errors and resubmit orders until they are notified of their rejection."[28] Thus, it is critical that CLECs receive appropriate information about their orders.

However, ordering status and quality measurement results are influenced by the "service" being ordered and the type of order being processed.[29] These two considerations are largely related to the complexity of an order, particularly its information content. In turn, the complexity of the order is highly correlated with the time necessary to provide status (acceptances/rejects, FOC, and completions) on the order. It is also correlated with the accuracy of the work performed on behalf of the CLEC.

---

[28] South Carolina Order, ¶117; See also Michigan Order, ¶187 ("as long as a competing carrier has not received a FOC, the competing carrier, as well as the customer, is unaware of the status of the order"); South Carolina Order, ¶130 ("[t]o the extent that the BOC does not provide timely order jeopardy notices to competing carriers, the impact of the missed due dates will be compounded by the inability of the competing carrier proactively to inform its customer and reschedule the time of service installation").

[29] Some orders may not reflect a specific retail offering, and thus may not be captured by the product category dimension. Such orders include standalone orders for directory listings, for directory assistance entries, or for both. Therefore, it is necessary to measure these types of orders as an "activity type."

Accordingly, order activity type is a key variable in determining the amount and complexity of work (and thus the associated processing time and the likelihood of order rejection or provisioning error) for specific orders. At a minimum, the following order activity types should be monitored. These activity types are consistent with version 2 of the OBF Local Service Ordering Guide (LSOG) as reflected in the "REQTYP" (Requisition Type and Status) and "ACT" (Activity) fields.[30]

- New Installations: an order that provides a service that the end user did not previously have
- Change: an order that adds, deletes or modifies the features associated with, or accessible by, a service arrangement but does not add or remove the underlying service for the customer
- Disconnect: an order that eliminates customer access to basic service functionality
- Inside Move: changes in the physical point of termination of a service within the customer location where the service is already provided
- Outside Move: changes in the point of service termination from one customer location to another
- LSP Conversion-as is: changes in the local service provider ("LSP") responsible for service delivery without changing the nature of the underlying service or features
- LSP Conversion-with changes: changes in the LSP responsible for service delivery and simultaneously

[30] SR STS-471071, issued April 18, 1997, effective April 18, 1997, pp. 17-18.

modifies the nature of the underlying service or features

- Records: makes administrative changes to a customer record without affecting the service delivered, e.g., changing the address to which the invoice is to be mailed

- Other Activity: all activities not discussed above, e.g., service suspensions and restorals.

3. Additional Measurement Disaggregations Are Necessary To Account For Volume/Complexity and Geographic Differences.

In a commercial (i.e., a true competitive) sense, parity means that, if a new entrant is as efficient and competent as the incumbent, a consumer who purchases a service from the CLEC that uses ILEC services or elements should be able to receive service that is equal in quality to a comparable service available from the ILEC. In the real world, ILECs frequently offer different service experiences based on the size or complexity of a customer's order or the geographic area in which a service request is processed.

The size and complexity of an order affect the types of processes needed to fulfill the service request. Geographic differences in performance occur because of differences in the age and condition of physical plant deployed in a particular area, and also because ILECs establish work group responsibilities specific to certain areas. The performance within each of these areas is, in turn, influenced by the

skill of the technicians assigned and the proficiency of the management team managing the work.

The parity requirement of Section 251(c) means that CLEC customers' experience may also vary in the same way as the experience of ILEC customers -- but no more.[31] Thus, differences in complexity and geography must be accounted for in the performance measurement process.

a. Volume/Complexity

ILECs often treat orders for large quantities of service differently from small orders. For example, Bell Atlantic-New York ("BA-NY") uses different processes to provision "small" orders of 1-9 loops, and "complex" orders for 10 or more loops.[32] The differences in the applicable processes for the different size order volumes may in fact be reasonable due to the additional coordination that may be required. However, Section 251 mandates that Bell Atlantic's service intervals for each order volume must be the same for all carriers, and Bell Atlantic has

---

[31] To the extent that any state determines that an ILEC's performance is unacceptable, it may of course prescribe a service improvement plan that would apply to all of the ILEC's customers, including CLECs. See NARUC Resolution, p. 2 ("States should retain the ability to establish the actual performance benchmarks, or the minimum performance requirements, based upon the ILEC's own performance data").

[32] See Supplemental Affidavit of Gary Butler on Behalf of Bell Atlantic-New York, ¶ 5, New York Public Service Commission, Case 97-C-0271, filed November 3, 1997.

appropriately provided performance measurements that take this factor into account.[33] All other ILECs should be required to do the same.

b. Geographic Disaggregation

The Notice (¶ 38) specifically seeks comment on the type of geographic disaggregation that should be incorporated into ILECs' performance reports. In particular, it asks whether reporting should be based on state boundaries, LATAs, MSAs or some other relevant geographic area. AT&T suggests that, in order to track actual market experience, there is no single way to establish the geographic parameter for ILEC performance reports.[34] Rather, an ILEC's geographic reporting for CLECs should track the manner in which it records its own performance for itself, whether or not the ILEC currently discloses such disaggregated performance in public fora.[35]

---

[33] See Supplemental Affidavit of Julie Canny on Behalf of Bell Atlantic-New York, New York Public Service Commission, Case 97-C-0271, filed November 3, 1997 ("Canny Supplementary Aff."), Exhibit 2.

[34] Given the requirements of Section 271, BOCs must at least be required to provide statewide results.

[35] There is no doubt that such reporting is feasible. For example, BellSouth's data base schema for its proposed data warehouse identifies several ways that geographically disaggregated performance measurements could be maintained.

For business reasons, ILECs -- and especially large companies such as BOCs -- establish multiple areas or zones for operating and measuring the results of their own business in a given state. For example, for many purposes, Bell Atlantic-New York ("BA-NY") divides itself into a number of operating areas.[36] Customers in those different operating areas may have different experiences with BA-NY, because different plant and operations groups serve them.

Thus, a shopkeeper in an upstate rural county might receive a longer order interval from BA-NY when placing an order for a new second line that requires an outside dispatch than a dry cleaner that submits a similar order in Manhattan. This difference, in itself, is not objectionable. However, for a CLEC seeking to compete in Manhattan, the service interval provided in the rural area may well be inadequate to serve the Manhattan business. Moreover, an average of BA-NY's performance across both areas would provide a misleading BA-NY performance measurement for a CLEC seeking to compete only in Manhattan.

---

[36] For POTS services, BA-NY has four areas: Manhattan, Greater Metro, Suburban and Remaining NY State. For special services and trunks, there are two areas: LATA 132 and Remaining NY State. Similarly, Pacific Bell has four operating areas in California and SBC has a minimum of four in Texas.

Thus, only the BA-NY performance in the BA-NY-defined Manhattan area provides a suitable comparison to determine parity, because that is the interval against which the CLEC must compete.

Geographic differences are stark in some cases. For example, the standard interval for ordering 1-24 trunks from U S WEST in a high density area in Colorado (Denver, Boulder and Colorado Springs) is 7 business days. In contrast, a similar order in a low density area is 18 business days. If a CLEC were offering service in high density areas, it should expect a 7 day interval. If, however, U S WEST were only required to report a statewide average interval, it might (falsely) claim that it is providing parity to the CLEC with a provisioning interval that is significantly longer than 7 days.

For these reasons, the most reasonable and least burdensome way for ILECs to report its results geographically is to use the geographic reporting structure used by (or available internally to) the ILEC itself. In New York, California and Texas, RBOCs have agreed to provide geographically disaggregated provisioning data at a

sub-state level.[37] Other ILECs should be required to do the same.

4. Application of the Disaggregation Factors to Specific Performance Measurements

As noted above, the disaggregation factors do not apply uniformly to all performance measurements. For example, some capabilities, such as pre-ordering and general support measures, are typically provided from centralized locations and apply similarly to all products in all areas at all volume levels. In contrast, order size should be irrelevant to the measurements for repair and maintenance, but maintenance performance may vary by geography. Thus, it is appropriate to identify which disaggregations should be applied to each performance measurement. Attachment E provides a detailed chart that identifies which disaggregations should be applied to each recommended

---

[37] Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies, Order Approving Interim Guidelines for Carrier-to-Carrier Performance Standards and Reports, Case 97-C-0139, New York Public Service Commission, issued and effective March 16, 1998; Investigation of Southwestern Bell Telephone Company's Entry into the InterLATA Telecommunications Market, Case No. 16251, Texas Public Utility Commission, Affidavit of William R Dysart, pp. 10-12, filed April 17, 1998; Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture Development of Dominant Carrier Networks, et al., Case No. R.93-04-003, California Public Utilities Commission, Rebuttal Affidavit of Gwen Johnson, Attachment A, filed May 20, 1998.

performance measurement. In addition, that attachment identifies the measurements for which performance should be reported separately based on the specific electronic interface used to provide CLECs access to the ILEC's support systems.[38]

C. Additional ILEC Analogs Are Needed To Permit Appropriate Comparisons Of ILECs' Performance For Themselves And CLECs.

It is critical that the results in the individual CLEC product groupings are compared to the ILEC's performance for the most comparable activity it performs for itself; otherwise the performance measurement process will not provide an accurate determination of parity.

The purpose of performance measurements is to enable regulators, carriers and others to compare the ILECs' performance in serving themselves and their retail customers, on the one hand, and new competitors on the other. The Notice (¶ 29) correctly states that

> "for those OSS functions provided to competing carriers that are analogous to OSS functions that an incumbent LEC provides itself in connection with retail service offerings, the incumbent LEC must provide access to competing carriers that is equivalent to the level of access that the incumbent LEC provides to itself in terms of quality, accuracy, and timeliness. . . [C]ompeting carriers must have access to OSS functions that allows them to make use of such functions in

[38] See Notice, ¶ 40.

> 'substantially the same time and manner' as the incumbent LEC."

Thus, it is critical that the Commission use every reasonable means to identify appropriate ILEC analogs for the services and elements that CLECs purchase from the ILECs.

AT&T's experience is that there is a reasonable ILEC retail or internal analog for virtually everything that a CLEC could purchase from an ILEC, whether a retail service or an unbundled network element. Indeed, a CLEC can only purchase the use of capabilities, facilities and equipment that are already inherent in an ILEC's network. Moreover, the CLECs' ordering, provisioning and repair and maintenance requests are fulfilled using work processes that the ILECs employ for the same or similar purposes. Thus, there is no reason to assume that any but the most arcane CLEC request could not be measured against a similar process the ILEC performs for itself or its own retail customers.

Further, the Commission has already held that comparisons for these purposes do not need to be perfect, only reasonable. As the Commission stated in its order rejecting Ameritech's Section 271 application for Michigan,

> "equivalent access, as required by the Act and our rules, must be construed broadly to include analogous functions between competing carriers and the BOC, even if the actual mechanism used to

> perform the function is different for competing carriers than for the BOC's retail operations."[39]

Thus, there is hardly any item that a CLEC could purchase pursuant to Section 251 that an ILEC does not also provide in a similar manner to itself, its affiliates or its customers. As a result, ILECs should bear a heavy burden to show that there is no ILEC activity that can provide a reasonable analog for purposes of determining parity.

In some cases, reasonable ILEC analogs can be derived by looking at portions of processes ILECs perform in providing an entire retail service. In others, the ILEC analog may be based on an ILEC retail offering that requires the ILEC to complete more functions than it performs in providing a service or an element to a CLEC. Both of these situations are likely to apply in measuring the ILEC's provision of unbundled network elements. Nevertheless, ILEC analogs for the functions they perform for CLECs are virtually ubiquitous, and the Commission should not allow ILECs to claim otherwise.[40]

---

[39] Michigan Order, ¶ 139 (emphasis added).

[40] In all events, ILECs must provide CLECs with "access sufficient to allow an efficient competitor a meaningful opportunity to compete" (Notice, ¶ 29).

Appendix A to the Notice provides ILEC retail analogs that rely principally on resale. These analogs are obvious, because resold services are mirrors of the retail services offered by the ILEC. AT&T's Attachment _ provides some examples of ILEC analogs for services and elements that CLEC purchase for incumbents, especially items such as unbundled loops. These analogs are based on comparisons of the actual work that the ILEC must perform to provide and maintain such items. As shown in that attachment, there are ways to define ILEC analogs for UNEs that will enable appropriate comparisons to be made of the ILEC's performance for itself and for CLECs.

For a number of UNE configurations, the ILEC retail analog is readily apparent. Thus, the issue is not whether retail analogs exist for virtually all the commonly employed UNEs; they clearly do. The ILECs are correct that comparing a UNE loop hot cutover to installation of retail POTS is not necessarily the most appropriate comparison. However, that does not mean there is no reasonable retail analog. Rather, what is required is a review of the component activities involved with the ILEC's day-to-day support of retail service. In the case of a "hot cut," the retail analog could be what is referred to as an "inside move." In such cases, the ILEC changes the loop for a customer who is moving to a new premises within the same central office,

without taking the customer out of service for an extended period.

D. The Measurement Disaggregations And Analogs Recommended By AT&T Are Not Burdensome.

One of the major voids in the record is a clear statement from ILECs of the items they record and measure for their own business purposes. This issue was highlighted in the comments on the LCI/CompTel Petition.[41] Nevertheless, ILECs have still generally not provided significant information on their own recordkeeping activities. AT&T has every reason to believe, however, that ILECs maintain prodigious amounts of information regarding their own activities. For example, in its filing in response to the Nevada procedural order regarding performance measurements (see Attachment A), the Sprint local telephone operating company

> "support[ed] the measurement categories and methodologies identified by [LCUG] . . . [and] recommend[ed] implementation of these measures and propose[d] that the Commission adopt these functions/methodologies for beginning the process of measuring and reporting ILEC performance."[42]

---

[41] E.g., AT&T Comments dated July 10, 1997, pp.7-11; AT&T Reply dated July 30, 1997, pp. 8-13.

[42] In re Commission Investigation into Procedures and Methods Necessary to Determine whether Interconnection, Unbundled Access, and Resale Services Provided by Incumbent Local Exchange Carriers are At least Equal In Quality to that Provided by the Local Exchange Carrier to Itself or to Any Subsidiary, Affiliate, or Any Other Party, Case No. 97-9022, filed March 2, 1998, Brief of Sprint, p. 4.

Sprint also supported a requirement that ILECs "report performance measurements to the level of detail proposed [by LCUG]."[43] Clearly, Sprint could not have recommended such requirements for itself if it did not have the capability to provide such detail.

In all events, the ILECs' continuing failure to provide information about their own records should not be allowed to hamstring the competitive process. In particular, an ILEC that has not provided a complete list of every one of its internal measurement plans and systems should not be permitted to argue that it lacks an analog for an element, service or facility provided to CLECs. In addition, the ILEC has unique knowledge of those plans and systems. Therefore, the existence of an analog should be presumed unless the ILEC provides an explanation from a responsible manager under oath explaining why none of its existing measurements provides a reasonable analog to the work it must performs to provide service to a CLEC.

Requiring use of the analogs proposed by AT&T, and similar analogs, would not be burdensome to ILECs. To the extent that an ILEC can demonstrate that it cannot reasonably track its performance with respect to any

---

[43] Id., p. 5.